

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOHN D. CERQUEIRA,

Plaintiff,

V.

AMERICAN AIRLINES, INC.,

Defendant.

CIVIL ACTION NO.: 05-11652 WGY

**DEFENDANT, AMERICAN AIRLINES, INC.'S
MOTION FOR ATTORNEYS' FEES AND COSTS**

Pursuant to Fed.R.Civ.P. 54(d)(2) and 42 U.S.C § 1988, defendant, American Airlines, Inc. (“American”), respectfully submits this Motion for Attorneys’ Fees and Costs. American prevailed on appeal on the claims brought by plaintiff, John D. Cerqueira under 42 U.S.C § 1981. The Court entered Judgment in favor of American against Mr. Cerqueira on January 16, 2008.

American requests an award of \$330,839.75 in fees and \$5,486.31 in costs. In support of this Motion, American relies on the accompanying Memorandum, as well as the Affidavit of Michael A. Fitzhugh.

WHEREFORE, American respectfully requests that this Motion for Attorneys' Fees and Costs be allowed and that the plaintiff be order to pay \$330,839.75 in attorneys' fees and costs in the amount of \$5,486.31.

AMERICAN AIRLINES, INC.

By Its Attorney,

/s/ Michael A. Fitzhugh

Michael A. Fitzhugh, Esq.

BBO #: 169700

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Dated: April 15, 2008

L.R. 7.1 (a)(2) CERTIFICATION

Pursuant to L.R. 7.1 (a)(2), I, Michael A. Fitzhugh, hereby certify that on April 15, 2008, I conferred in good faith with counsel for John D. Cerqueira regarding this motion in an attempt to narrow or resolve the issues presented.

/s/ Michael A. Fitzhugh

Michael A. Fitzhugh

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 15, 2008.

/s/ Michael A. Fitzhugh

Michael A. Fitzhugh